

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

C.A. NO: 04 10685 WGY

MELINDA BROWN AND)
TREFFLE LAFLECHE,)
)
PLAINTIFFS)
)
VS.)
)
AMERICAN INTERNATIONAL GROUP,)
INC. AND NATIONAL UNION FIRE)
INSURANCE COMPANY OF)
PITTSBURGH, PENNSYLVANIA,)
)
DEFENDANTS)

DEFENDANTS' MOTION TO FILE A REPLY TO PLAINTIFF'S REPLY
BRIEF

The defendants, American International Group, Inc. (AIG) and National Union Fire Insurance Company of Pittsburgh, Pa. (National Union), move that the Court accept the attached Reply Brief on their behalf for consideration at the hearing on June 21, 2004.

In support for this Motion, said defendants say that plaintiffs' reply to their Opposition to the plaintiffs' Motion For Summary Judgment betray a misunderstanding of the insurance policy at issue which the reply on behalf of the defendants is intended to correct. No prejudice will

occur by the Court's reception of the defendants' Reply Brief.

By their attorneys,

FINNEGAN, UNDERWOOD,
RYAN & TIERNEY

s/John G. Ryan

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June 17, 2004.